Allan S. Brilliant (AB 8455) Emanuel C. Grillo (EG 1538) Brian W. Harvey (BH 2518) GOODWIN PROCTER LLP Counsel for the Ad Hoc Committee 599 Lexington Avenue New York, New York 10022 (212) 813-8800

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----x

NOTICE OF AMENDMENT TO ANNEX A TO VERIFIED STATEMENT PURSUANT TO BANKRUPTCY RULE 2019 OF GOODWIN PROCTER LLP

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on October 24, 2005, the undersigned filed that certain Verified Statement Pursuant to Bankruptcy Rule 2019 of Goodwin Procter LLP (the "Statement"). Capitalized terms not defined herein have the meanings given to them in the Statement.

PLEASE TAKE FURTHER NOTICE that Annex A to the Statement, which sets forth a list of members of the Ad Hoc Committee, is hereby amended and restated in its entirety in the form attached hereto.

Dated: New York, New York October 26, 2005

GOODWIN PROCTER LLP

By: /s/ Brian W. Harvey

Allan S. Brilliant (AB 8455) Emanuel C. Grillo (EG 1538) Brian W. Harvey (BH 2518) GOODWIN PROCTER LLP 599 Lexington Avenue New York, New York 10022 (212) 813-8800 Counsel for the Ad Hoc Committee

ANNEX A

Quadrangle Master Funding Ltd. 375 Park Avenue, 14th Fl. New York, NY 10152

DK Acquisition Partners LP 885 Third Avenue, Suite 3300 New York, NY 10022

Springfield Associates, LLC Kensington International Limited 712 Fifth Avenue, 36th Fl. New York, NY 10019

Cyrus Opportunities Master Fund II, Ltd. c/o Cyrus Capital Partners 390 Park Avenue, 21st Floor New York, NY 10022

Latigo Partners, L.P. 590 Madison Avenue, 9th Floor New York, NY 10022

Canyon Capital Partners 9665 Wilshire Blvd. Beverly Hills, CA 90212

D. E. Shaw Laminar Portfolios, L.L.C. 120 West 45th Street 39th Floor New York, NY 10036

Special Situations Investing Group, Inc. 85 Broad Street New York, NY 10004

Longacre Capital Partners (QP), L.P. Longacre Master Fund, Ltd. c/o Longacre Fund Management LLC 810 7th Avenue, 22nd Floor New York, NY 10019

05-44481-rdd Doc 670 Filed 10/26/05 Entered 10/26/05 12:13:28 Main Document Pg 4 of 4

Concordia Distressed Debt Fund LP Concordia Mac 29 Ltd. c/o Concordia Advisors LLC 1350 6th Avenue, Suite 3202 New York, NY 10019

Avenue Capital Group 535 Madison Avenue, 14th Floor New York, NY 10022